

UNITED STATES DISTRICT COURT FOR THE NORTHERN
DISTRICT OF NEW JERSEY
CIVIL DIVISION / CRIMINAL DIVISION

AUGUST 10, 2021.
PRO SE

JULIO RODRIGUEZ
135 MONROE STREET APT 401
NEWARK NJ 07105

JULIO RODRIGUEZ INDIVIDUALLY AND
THE ACCES NEWS CORP
CARS CARS CARS CORP
CARS BY ARGUETA AND RODRIGUEZ CORP.
SABOR MAR Y TIERRA CORP ET ALL.,

PLAINTIFF,

vs.

SONY DOE JOE ET ALL.,
NEWARK OPERATING INC

BAD FAITH, UNFAIR DEALING, FRAUD AND COURT FRAUD

COMPLAINT AND JURY DEMAND WITH A RESTRAINING ORDER

UNDER THE FEDERAL Civ R 38 Right to Jury Trial

UNDER THE FEDERAL Civ R 3(b) Demand

UNDER THE 7th Amendment of the Constitution of the United States

CLERK
U.S. DISTRICT COURT
DISTRICT OF NEW JERSEY
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2021 AUG 19 A 11:37

**THE PLAINTIFF JULIO RODRIGUEZ ET AL., SUES THE DEFENDANTS FOR
MONEY DAMAGES AND STATES; AND BRING THE COMPLAINT BASE ON THE
FOLLOWING CAUSES OF ACTION, FACTS AND LAW ;**

BAD FAITH AND UNFAIR DEALING

FRAUDULENT MISREPRESENTATION

FRAUD

DECEPTION

UNSCRUPULOUSNES

LACK OF INFORMATION

DOUBLE DEALING

DISCRIMINATION

DEFAMATION OF CHARACTER

PROPERTY TREAT

CONSUMER FRAUD

DUE PROCESS

COURT FRAUD

VIOLATION OF CONSUMER FRAUD ACT

THE NEW JERSEY AND UNFAIR TRADE PRACTICES ACT

INTENTIONAL DOMINO DAMAGES

FALSE STATEMENTS AND PERJURY

THE TORT CLAUSE ACT

BREACH OF ITS LEGAL DUTY

COMPLAINT

**PLAINTIFF JULIO RODRIGUEZ ET AL., SUES DEFENDANTS FOR DOMINO
CAUSE AND MONEY DAMAGES AND SAYS:**

JURISDICTIONAL ALLEGATIONS

THIS IS AN ACTION FOR MONEY DAMAGES IN EXCESS OF \$50,000.00

**AT ALL TIMES MATERIAL TO THIS LAWSUIT, PLAINTIFF JULIO RODRIGUEZ ET
AL., WERE RESIDENTS OF ESSEX COUNTY NEW JERSEY**

**ALL ACTS NECESSARY OR PRECEDENT TO THE BRINGING OF THIS LAWSUIT
OCCURRED OR ACCRUED IN ESSEX COUNTY**

**THIS COURT HAS JURISDICTION AND DEFENDANT PRAYS FOR JUSTICE INDER
THE LAWS AND CONSTITUTIONAL LAWS OF THE UNITED STATES**

**NOW COMES RESPECTFULLY PLAINTIFF JULIO RODRIGUEZ
INDIVIDUALLY AND ET AL REQUESTING THIS COURT TO ISSUE A
DECLARATORY JUDGMENT, PRELIMINARY and PERMANENT INJUNCTIVE
RELIEF JOINING DEFENDANTS FALSE FRAUDULENT COMPLAINT IN ESSEX
COUNTY COURT WITHOUT PREJUDICING AN INVESTIGATION WITH THE ESSEX
COUNTY JUDGE HONORABLE ROBERT H. GARDNER, J.S.C. FOR SIGNING AN
ORDER TO SHOW CAUSE FOR EJECTMENT DURING COVI EMERGENCY ACT
ALSO WITHOUT SERVING THE PLAINTIFF JULIO RODRIGUEZ PROPERLY AS
LAW REQUIRES AND/OR HAVING ESPECIAL CONNECTIONS WITH THE**

DEFENDANTS LAW FIRM OR LAWYER. PLAINTIFF JULIO RODRIGUEZ PRAYS FOR JUSTICE AND RELY ON THE NEW JERSEY LAWS AND CONSTITUTION OF THE UNITED STATES FOR ITS RIGHTS AND REQUEST FOR JUSTICE UNDER TREASON IF HIS CONSTITUTIONAL RIGHTS ARE VIOLATED DEFENDANT JULION RODRIGUEZ DEMAND FOR DAMAGES CAUSED BY THE DEFENDANT NEWARK OPERATING INC AND SONIE DOE JOE INDIVIDUAL 1- 10 PLAINTIFF SHOWS ONTO THE COURT HEREBY AND STATES AS FOLLOWS :

AN ACTUAL CONTROVERSY EXISTS BETWEEN THE PARTIES, IN THAT CHALLENGED ACTIONS OF THE DEFENDANT HAS CAUSED AND CONTINUE TO CAUSE THE PLAINTIFF A DOMINO SUBSTANTIAL HARM UNLESS THE REQUEST RELIEF IS GRANTED.

VENUE IS PROPER, BECAUSE MANY OF THE REVENANT EVENTS OCURRED WITHIN ESSEX COUNTY IN THE STATE OF NEW JERSEY, WHICH IS LOCATED WITHIN THIS DISTRICT, THEREFORE. THIS COURT HAS JURISDICTION, ALSO PURSUANT TO THE FOLLOWING STATUTES:

28 U.S.C. 1331, WHICH GIVES DISTRICT COURTS ORIGINAL JURISDICTION OVER CIVIL ACTIONS ARISING UNDER THE CONSTITUTION, LAWS OR TREATIES OF THE UNITES STATES .

28 U.S.U 1367, WHICH GIVES THE DISTRICT COURTS SUPPLEMENTAL JURISDICTION OVER STATE CLAIMS.

PLAINTIFF'S FEDERAL AND STATE LAW CLAIMS AGAINST THE DEFENDANT'S DERIVE FROM A COMMON FOCUS OF OPERATIVE FACTS AND ARE OF SUCH

CHARACTER THAT PLAINTIFF'S WOULD ORDINARILY BE EXPECTED TO TRY THEM IN ONE JURY TRIAL PROCEEDING. CONSEQUENTLY THIS COURT HAS PENDING JURISDICTION OVER PLAINTIFF'S STATE LAW AGAINST THE DEFENDANT'S. THEREFORE , VENUE IS APPROPRIATE IN THIS JUDICIAL DISTRICT UNDER 28 U S C 139 (b) BECAUSE THE EVENTS THAT GAVE RISE TO THIS COMPLAINT OCCURRED IN THIS DISTRICT.

PROPERTY LOCATION FOR THIS MATTER IS LOCATED AT 1-5 KOSSOUTH ST NEWARK NJ 07105 AKA 185 WILSON AVE NEWARK NJ 07105 5 GARAGES AND PARKING SPACES IN POSSESSION OF JULIO RODRIGUEZ AND BUSINESS PARTNER JIMMY ARGUETA.

THIS IS AN ACTION BROUGHT BY THE PLAINTIFF'S JULIO RODRIGUEZ RT., AI, FOR VIOLATIONS OF TGHE ABOVE NAMED ACTS IN CONNECTION WITH A PURPORTED BREACH OF THE COVENANT OF GOOD FAITH AND FAIR DEALING AGAINST THE DEFENDANT'S CONSTRUCTIVE FRAUD.

THIS COURT HAS JURISDICTION.

GENERAL FACTUAL ALLEGATIONS

BEFORE, ON, OR ABOVE JUNE 15TH 2020 PLAINTIFF JULIO RODRIGUEZ ENTERED INTO A WRITTEN AGREEMENT WITH DEFENDANT SONIE DOE AND NEWARK OPERATING INC TO RENT THE PREMISES LOCATED AT 1-5 KOSSOUTH ST NEWARK NJ 07105 AKA AS 185 WILSON AVE NEWARK NJ 07105 DURING COVI-19 STATE OF EMERGENCY AND NOT ONE WANTED TO RENT AT SUCH TIME, DEFENDANT JULIO RODRIGUEZ SUPPORT HIS FAMILY TOTAL OF FIVE AND KELLEYS MOTHER ESPECIALLY KELLEYS MOTHER WHOM SUFFERS FROM LUPUS AND WAS NOT JUST INTERVENE PLENTY TIMES IN THE HOSPITAL. BUT AT THIS CRUCIAL TIME OF COVI-19 HER IMMUNE SYSTEM IS VERY DELICATE WHERE SHE DEPENDS ON THE PLAINTIFF'S JULIO RODRIGUEZ SUPPORT AND CHILD SUPPORT., PLAINTIFF JULIO RODRIGUEZ AT TIME OF RENTING PLAINTIFF JULIO NRODRIGUEZ MADE AN AGREEMENT OF RENTING TOTAL OF 5 GARAGES AND PARKING SPACES FROM LEFT TO RIGHT ON THE LOCATION FOR TOTAL OF 10 YEARS IN ORDER TO TRANSFER A LICENSED USED CAR DEALERSHIP FROM DELRAN NEW JERSEY AND ALSO OPERATE A MECHANIC SHOP AND OTHER CAR BUSINESSES PLAINTIFF JULIO RODRIGUEZ WHOM IS A CERTIFIED FRAUD EXAMINER AND IS CERTIFIED TO DO AUDITS STATE AND FEDERAL OWNS THREE NEWSPAPERS WERE PLAINTIFF JULIO RODRIGUEZ WAS USING THE SUBJECT PROPERTY OFFICE FOR SUCH USE THE IMPACTO NEWS, THE ACCESS NEWS AND JAYS NEWS ALL LEGAL CORPORATIONS FOR THE STATE OF NEW JERSEY

PLAINTIFF JULIO RODRIGUEZ COMPLIED WITH HIS WRITTEN AGREEMENT UP TO THE POINT OF OFFERED THE DEFENDANT SONIE DOE AND NEWARK OPERATING INC PAID IN ADVANCE BUT DEFENDANT REJECTED THE PAYMENT AND SAID IT WAS NOT NECESSARY., PLAINTIFF WAS DOING SO GREAT AT THE PROPERTY THAT INVESTED A GREAT AMOUNT OF MONEY IN A BAKERY RESTAURANT AND LOUNGE LOCATED AT 68 WILSON AVE NEWARK NJ 07105 AND 427 LAFAYETTE ST NEWARK NJ 07105 WHERE THE PLAINTIFF JULIO RODRIGUEZ ENTERED INTO A WRITTEN AGREEMENT TO LEASE AND BUY A LIQOUR LICENSE AND THE PREMISES AND A PROSPECT GAS STATION CONTRACT WITH SUNOCO TO USE IT FOR THE PURPOSE OF PARKING FOR THE BAKERY, RESTAURANT AND LOUNGE KNOW AS SABOR MAR Y TIERRA AND LA CABAÑA COLOMBIANA BOTH NEW JERSEY CORPORATIONS WHILE PLAINTIFF WAS DOING GOOD AND DEVELOPED THE DEFENDANTS PROPERTY 1 - 5 KOSSOUTH ST NEWARK NEW JERSEY AKA 185 WILSON AVE NEWARK NEW JERSEY DEFENDANT STARTED GETTING OFFERS MORE OFFERS AND BETTER OFFERS THAN THE ONE DEFENDANT ALREADY SIGNED FOR WITH THE PLAINTIFF JULIO RODRIGUEZ FOR TOTAL OF 10 YEARS. DEFENDANT SONIE JOE DURING TIME WAS GETTING OFFERS ASKED THE PLAINTIFF JULIO RODRIGUEZ TO JOINT ANOTHER PERSON TO PARTNER WITH PLAINTIFF TO GET PAY MORE PLAINTIFF JULIO RODRIGUEZ REJECTED SUCH PROPOSITION.

DUE TO REJECTED PROPOSITIONS BY THE DEFENDANT SONIE JOE., THE DEFENDANT STARTED TO MAKE THE PLAINTIFFS JULIO RODRIGUEZ BUSINESS IMPOSSIBLE AND IN HELL.

PLAINTIFF JULIO RODRIGUEZ ASKED THE DEFENDANT SONIE JOE TO BRING AN OFFICIAL LEASE AS PROMISED BY THE BAD FAITH DEFENDANT SONIE JOE UNTIL NOW DEFENDANT SONIE JOE HAVE NOT COMPLY. PLAINTIFF JULIO RODRIGUEZ ET AL., NEED IT IN ORDER TO TRANSFER HIS USED CAR DEALER LICENSE TO THE SUBJECT PROPERTY DURING THE CITY OF NEWARK REQUIREMENTS DEFENDANT DENIED PLENTY OF TIMES THE ACCESS TO THE CERTIFICATE OF OCCUPANCY NEEDED BY THE PLAINTIFF TO BE LICENSE FROM THE CITY OF NEWARK TO OPERATE THE PLAINTIFFS BUSINESS, PLAINTIFF JULIO RODRIGUEZ ALSO NEED IT THE CERTIFICATE OF OCCUPANCY AND THE WASTED GARBAGE CONTRACT THAT DEFENDANT PROMISED TO GIVE THE PLAINTIFF TOGETHER WITH THE FORMAL LEASE TO PROCESS THE PAPER WORK WITH NJ DMV TO HAVE THE DEALERSHIP TRANSFERRED TO THE SUBJECT PROPERTY., THE DEFENDANT SONIE JOE FAILED TO PROVIDE ALL THIS IMPORTANT DOCUMENTS UNTIL NOW FOR THE PLAINTIFF JULIO RODRIGUEZ. PLAINTIFF AT ONE TIME WAS GOING TO BE SHUT DOWN BY THE CITY OF NEWARK WERE DEFENDANT LIED TO THE FIRE INSPECTOR THAT DEFENDANT DID NOT HAVE THE CEO IN THE PREMISES, INSPECTOR HAD TO GO INSIDE DEFENDANTS OFFICE TO PULL A COPY

FIRE INSPECTOR ADVISED DEFENDANT SONIE JOE THAT HAD TO PROVIDE THE PLAINTIFF JULIO RODRIGUEZ WITH THE DOCUMENTS AND LEASE TOGETHER WITH THE GARBAGE CONTRACT. BAD FAITH DEFENDANT SONIE JOE AT ALL TIMES DENIED THE DOCUMENTS TO PLAINTIFF JULIO RODRIGUEZ MAKING IT IMPOSSIBLE TO TRANSFER CARS BY ARGUETA AND RODRIGUEZ AS AGREED ON A WRITTEN CONTRACT SIGNED ON OR ABOVE JUNE 15, 2020 DURING STATE OF EMERGENCY FOR COVI-19., DEFENDANT SONIE JOE UNTIL NOW HAS BREACH SUCH CONTRACT.

DEFENDANT SONIE JOE HAD NOT JUST BREACH THE WRITTEN SIGN CONTRACT BUT ALSO HAD TRIED DOUBLE DEALING WITH OTHER PEOPLE. DEFENDANT SONIE JOE AT ALL TIMES TRIED TO INDUCE PLAINTIFFS WORKERS TO MAKE PLAINTIFFS JULIO RODRIGUEZ BUSINESS COLLAPSE. WITH A PROMISED OF RENTING THE PLACE DIRECTLY TO THEM DEFENDANT SONIE JOE MADE IT IMPOSSIBLE TO DO BUSINESS AT ALL TIMES MAKING FALSE DEFAMATION OF CHARACTER STATEMENTS ABOUT PLAINTIFF JULIO RODRIGUEZ. DEFENDANT CORRUPT / OR INCOMPETENT CONSPIRED WITH EXWORKER FOR PLAINTIFF JULIO RODRIGUEZ TO ROB HIS PLACE DENING ACCESS TO HIS CAMERAS WHEN EX-WORKERS ROB PLAINTIFF JULIO RODRIGUEZ PLACE. DEFENDANT DENIED ACCESS TO POLICE AT THE TIME OF EVENT KNOWING THAT THE PLACE WAS ROB BY THE EX-WORKERS THAT WERE TRYING TO MAKE PLAINTIFF JULIO RODRIGUEZ BUSINESS COLLAPSE

DEFENDANT SONIE JOE AT ALL TIMES LACK PLAINTIFF JULIO RODRIGUEZ FROM DOING BUSINESS BY INTERFERING WITH HIS EMPLOYEES AND PROPERTY; DEFENDANT SONIE JOE SHUT OFF THE ELECTRICITY IN ORDER TO MAKE PLAINTIFFS JULIO RODRIGUEZ COLLAPSE., AND MAKING IMPOSSIBLE FOR PLAINTIFF JULIO RODRIGUEZ DO BUSINESS., BUSINESS THAT SUPPORT OTHER BUSINESS AND PLAINTIFFS FAMILY. DEFENDANT SONIE JOE DECIDED TO ENFORCE HIS OWN LAW IGNORING AND ACTING FRAUDULENT AND BAD FAITH AND IS THE WAY DEFENDANT TRICKERY DO BUSINESS.

PLAINTIFF JULIO RODRIGUEZ REQUESTED A RESTRAINING ORDER AGAINST DEFENDANT SONIE JOE DUE TO SEVERAL TREATS TO HARM PLAINTIFFS LIFE AND PLAINTIFFS PROPERTY; DEFENDANT SONIE JOE HAD AND IS CAUSING AN IRREPARABLE HARM TO PLAINTIFF AND IS NEED THE INTERFERENCE OF LAW IN THIS CASE; DEFENDANT SONIE JOE IGNORANT HAD SHUT OFF THE ELECTRICITY ON PLAINTIFFS JULIO RODRIGUEZ SUBJECT MATTER LOCATION KNOWING THAT PLAINTIFFS JULIO RODRIGUEZ HAVE CARS ON MECHANIC LYFTS AND CAN CAUSE AN ACCIDENT TO ANY ONE WITHOUT CARING OF THE CONSEQUENCES OF THAT CRIMINAL ACTIONS.

DEFENDANT SONIE DOE RENTED A PROPERTY WITHOUT NOTICING THAT IT WAS UNDER INVESTIGATION AND WAS NOT SUPPOSED TO RENT IT LEGALLY. AS A DIRECT RESULT FROM DEFENDANTS SONIE JOE ACTIONS PLAINTIFF

JULIO RODRIGUEZ BUSINESS HAD COLLAPSE AND HIS FAMILY IS IN JEOPARDY AND RELATIONSHIP HAD DESTROY.

DEFENDANT PROMISED TO RENT A LEGAL AND AVAILABLE SPACE TO PLAINTIFF TO DO BUSINESS IN THE SUBJECT MATTER LOCATION, DEFENDANT SONIE JOE HAD DECEIT PLAINTIFF JULIO RODRIGUEZ DO THAT HAD NOT A LEGAL LOCATION AS PROMISED TO PLAINTIFF JULIO RODRIGUEZ TO DO BUSINESS.

ON OR ABOVE JUNE 30, 2021 A LAWYER RETAINED BY THE DEFENDANT IDIOT LAWYER BY THE NAME OF STANLEY M VARON WITH SOME CONNECTIONS IN COURT WROTE A LETTER OF INTIMIDATION TO PLAINTIFF JULIO RODRIGUEZ AND ITS BUSINESS SAYING THAT PLAINTIFF JULIO RODRIGUEZ HAVE TO SURRENDER THE PROPERTY TO DEFENDANT SONIE JOE BECAUSE THEY SAID SO. , WITHOUT A VERIFY COMPLAINT SERVED TO PLAINTIFF JULIO RODRIGUEZ. HOWEVER ON JULY 25, 2021. PLAINTIFF JULIO RODRIGUEZ FOUND OUT BY ONE OF DEFENDANTS EMPLOYEES THAT DOCUMENTS WERE HIDING IN DEFENDANTS SONIE JOE ONLY ACCESS OFFICE AND NOTICED A COURT PAPER WITH A NOTICE FILED IN ESSEX COURT WITH A NOTICE TO SHOW CAUSE WITHOUT NEVER SERVING PROPERLY THE PLAINTIFF WITH THE VERIFY COMPLAINT. IDIOT LAWYER STANLEY M VARON ATTORNEY AT LAW FROM NEW JERSEY DEPRIVED PLAINTIFF JULIO RODRIGUEZ FROM SERVING PLAINTIFF JULIO RODRIGUEZ PROPERLY WITH A VERIFY COMPLAINT.

**NEW JERSEY LAWYER STANLEY M VARON LICENSED IN NEW JERSEY
DECIDED TO JOIN THE DEFENDANT SONIE JOE WITH ITS CRIMINAL ACTIONS
OF DOING LAW BY THEIR HANDS PLAINTIFF DEMANDS FOR COURT FRAUD
AND TRICKERY BY THE DEFENDANTS SONIE JOE. PLAINTIFF JULIO
RODRIGUEZ WILL BE ASKING IN WRITING AN INVESTIGATION WITH THE
ETHICS COMMITTED AND THE ADVISORY COMMITTED ON JUDICIAL
CONDUCT. PLAINTIFF JULIO RODRIGUEZ IS AFRAID OF SUCH CRIMINAL
CONDUCT COURT FRAUD AND BY THE DEFENDANT SONIE JOE DO BUSINESS.
THOSE ACTION ARE PROHIBITED BY THE LAW AND THE CONSTITUTION OF
THE UNITED STATES AND ALL RIGHTS TO PLAINTIFF JULIO RODRIGUEZ ARE
BEING VIOLATED.**

**IDIOT LAWYER STANLEY M VARON AND LICENSED IN NEW JERSEY AS AN
ATTORNEY OF LAW WITH A DURY TO LAW DECIDED SPEECHLESS THE
PLAINTIFF JULIO RODRIGUEZ AND DEPRIVED PLAITIF JULIO RODRIGUEZ
WITH THE INTENTION TO DECEIT THE NEW JERSEY COURT SYSTEM AND THE
PLAINTIFF JULIO RODRIGUEZ DECITED TO JOINT HIS CRIMINAL CLIENTS
ACTIONS AND IGNORING AND MANIPULATING THE LAW UNDER THEIR HANDS
CAUSING AN IRREPARABLE HARM TO PLAINTIFF JULIO RODRIGUEZ
INDIVIDUALLY ITS BUSINESS ITS PARTNERS AND FAMILY.**

**DEFENDANTS SONIE JOE FALSE PROMISED TO RENT A LEGAL PLACE HAD
FAILED; DEFENDANTS SONIE JOE PROMISED TO COMPLY WITH CONTRACT
HAD FAILED; DEFENDANTS ACTS IN GOOD FAITH AND BY LAW HAD FAILED**

PLAINTIFF JULIO RODRIGUEZ REQUESTED A RESTRAINING ORDER AGAINST THE DEFENDANTS IMMEDIATELY AND THE ACCESS TO THE ELECTRICITY BOX SO ITS EMPLOYEES CAN START WORKING AND PRODUCE THE MONEY NEED IT FOR ITS BUSINESS. PLAINTIFF JJULIO RODRIGUEZ PRAYS AND DEMANDS THAT IF DEFENDANTS ACTIONS AND FALSE STATEMENTS CONTINUE PLAINTIFF JULIO RODRIGUEZ DEMANDS FOR PERJURY CHARGES AND DEFENDANTS ARE SUBJECT TO PUNISHMENT FOR SUCH ACTS.

WHEREFORE PLAINTIFF JULIO RODRIGUEZ DEMANDS JUDGMENT FOR AGAINST THE DEFENDANTS, MENTIONED ABOVE INDIVIDUAL , AND DOE ANY OTHER 1-10 FOR \$5,000.000..00 DAMAGES TOGETHER WITH INTEREST, COSTS AND OR OTHER FEES TIME STRESS, AGGRAVATION, MENTAL SUFFERING, NERVOUSNESS, ANXIETY,SHOCK HUMILLATION, INDIGNITY, AND PHYSICAL PAIN., PLUS PUNITIVE DAMAGES.

JURY DEMAND

PLEASE TAKE NOTICE THAT THE PLAINTIFF'S HEREIN DOES HEREBY DEMAND A TRIAL BY JURY OFBTHE WITHIN CAUSE OF ACTION ON ALL ISSUES AND WILL RELY ON THE 7TH AMENDMENT OF THE CONSTITUTION OF THE UNITED STATES AND ACCORDING TO THE RULES OF THE COMMON LAW.

Plainty
Julio Rodriguez
